



**U.S. DEPARTMENT OF JUSTICE**  
**Federal Bureau of Prisons**  
*Metropolitan Detention Center*

80 29<sup>th</sup> Street  
Brooklyn, New York 11232

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April 28, 2021

**BY ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: ***United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)***

Dear Judge Nathan:

I am writing in response to your April 26, 2021, Order seeking information regarding an alleged incident involving Ghislaine Maxwell, Register No. 02879-509, at the Metropolitan Detention Center in Brooklyn, New York (MDC Brooklyn) as relayed by her counsel in an April 26, 2021, letter.

Pursuant to MDC Brooklyn policy, Institutional Supplement BRO-5267.09A, *Inmate Visiting Correctional Services*, inmates may carry legal materials to the visiting area which pertain to their current case. Visiting Room Officers inspect the legal materials for contraband. Inmates are not permitted to carry out any items other than those they were allowed to be take into the Visiting Room. Visiting Room Officers monitor inmate visits and if they become aware of any articles passed between the inmate and the visitors, or “if there is any reasonable basis to suspect materials are being passed between inmates and visitors, the Visiting Room Officer may examine the item(s).”

Legal staff is responsible for assigning inmates and their attorneys to particular room. However, this is subject to change by the Visiting Room Officer, who is ultimately responsible for room and seating assignments. MDC Brooklyn sets forth these rules in *Admissions and Orientation Handbook*, which is given to each inmate upon admission to the institution.

On Saturday, April 24, 2021, Ms. Maxwell had a scheduled legal visit with her legal counsel. During legal visits, attorneys may refer to and hand legal documents to their clients, so long as the documents are returned to the attorneys' possession at the conclusion of the visit. During Ms. Maxwell's legal visit, staff noted that she was in receipt of documents that were handed to her by the attorneys. Upon completion of the legal visit, the Visiting Room Officer notified the supervisor that Ms. Maxwell was in receipt of documents that were handed to her by her attorneys. Pursuant to Institutional Supplement BRO-5267.09A, *Inmate Visiting Correctional Services*, the supervisory staff were notified and identified the documents that staff referred to. Ms. Maxwell was returned to her housing unit and Legal staff were notified.

I informed the supervisor to place the documents in an envelope, date and secure the envelope. I advised the supervisor to return the envelope to Ms. Maxwell's attorneys on Sunday, April 25, 2021, when they returned for another legal visit with Ms. Maxwell, and to tell the attorneys to place in the envelope and any future documents for Ms. Maxwell in one of the legal depository boxes in the lobby of the East and West buildings of MDC Brooklyn.

In addition, staff acted appropriate when Ms. Maxwell was escorted to the restroom. Pursuant to MDC Brooklyn policy, Institutional Supplement BRO-5267.09A, *Inmate Visiting Correctional Services*, inmates who use the Visiting Room restroom are escorted by staff and remain under staff's constant supervision.

We respectfully request Your Honor deny defense counsel's proposed order. Please let us know if the Court requires any additional information, which we will be happy to provide.

Respectfully submitted,

/s/ *Sophia Papapetru*

**Sophia Papapetru**  
Staff Attorney  
MDC Brooklyn  
Federal Bureau of Prisons